

**STEPHEN TSAI**  
**Law Offices**

991 U.S. Highway 22 West, Suite 102, Bridgewater, New Jersey 08807 USA  
Telephone: (908) 927-1000 Facsimile: (908) 927-1002

STEPHEN TSAI

\*Also admitted in N.Y.

May 29, 2009

via facsimile: (609) 989-0496

Hon. Freda L. Wolfson, U.S.D.J.  
Clarkson S. Fisher Federal Building and U.S. Courthouse  
402 East State Street, Room 5050  
Trenton, New Jersey 08608

Re: Siamak Matt Ghaffari v. Benjamin M. Hern  
Case No. 06-931 (FLW)

Motion for Summary Judgment

Dear Judge Wolfson:

This office serves as co-counsel to Siamak Matt Ghaffari, the Plaintiff in the above-referenced matter.

We respectfully request an adjournment of the Motion for Summary Judgment filed by the Defendant Benjamin Hern and an extension of the time to respond to the Motion. The Motion is currently returnable June 15, 2009, and the Plaintiff's response is due June 1, 2009.

We have already spoken with Mr. Hern's attorney, Mr. Sciarabone, and he graciously consents to a two-week extension.

We very much appreciate the Court's Consideration of this matter. Thank you.

Respectfully,

  
STEPHEN TSAI

ST/st

cc: Thomas C. Sciarabone, Esq. (via facsimile (732) 758-0799)  
Edward F. Siegel, Esq. (via facsimile (216) 831-6584)

1307A

IT IS SO ORDERED:

  
FREDA L. WOLFSON, U.S.D.J.